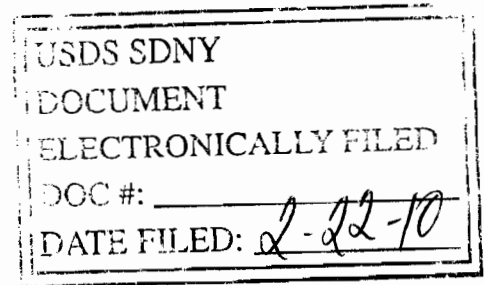




**restauri**  
*thinking them law*



VINCENT J. RESTAURI, JR.  
ATTORNEY AT LAW

February 21, 2010

Honorable Victor Marrero  
United States District Judge for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312  
BY FAX (212) 805-6382

OFFICE  
85 Firethorn Road  
Baden, Pennsylvania 15005

PHONE  
412.427.5914

FAX  
412.291.1123

EMAIL  
vince.restauri@gmail.com

RE: *Aroman Promotional Products, Inc. and Rosie Mankes, individually and derivatively  
on behalf of Gurl2Gurl Productions, Inc. v. Denise Restauri and Gurl2Gurl  
Productions, Inc. 10 CV 952*

**Request for Extension of Time to File Rule 12 Motion to Dismiss the Complaint in Lieu of Answer**

Dear Judge Marrero:

Because I have not yet entered an Appearance in this case, this Request for Extension of Time to File Rule 12 Motion to Dismiss the Complaint in Lieu of Answer is submitted *pro se* by Defendants, as indicated by the signature below. Defendant Denise Restauri is my sister and is President of Defendant Gurl2Gurl Productions, Inc. I have been retained by both Defendants to represent them in this case, and I will file a Motion to be Admitted *Pro Hac Vice* on this case this week, enter my Appearance and enroll in ECF if my Motion is granted. The delay in filing the *Pro Hac Vice* Motion results from the intended sponsoring attorney's recent discovery that her law firm has a rule that practically prohibits *pro hac vice* sponsorship in this type of case.

Following is Defendants' Request for Extension of Time to file a Rule 12 Motion to Dismiss the Complaint on behalf of both defendants:

**Original Response Due Dates:**

Denise Restauri	February 26, 2010
Gurl2Gurl Productions, Inc.	March 1, 2010

**Requested Revised Due Dates:**

Denise Restauri	March 15, 2010
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Gurl2Gurl Productions, Inc. March 15, 2010

**Number of Previous Requests for Adjournment or Extension by Defendants: 0****Whether Adversary Consents and Reasons if Objects:**

Unknown, awaiting reply to emailed correspondence in the morning of February 19, 2010 and the morning of February 20, 2010. Counsel have conducted settlement negotiations to date via the medium of email.

**Reasons for Request:**

First, settlement negotiations are ongoing. Substantial written discussions, including dollar offers, have taken place starting on February 16, 2010 and continuing on February 19, 2010.

Second, as more fully explained in the first paragraph of this Request, *Pro Hac Vice* papers for Vincent J. Restauri, Jr., on behalf of both Defendants, might not be completed and filed and an Order entered by the Original Response Date.

**All Other Dates Previously Scheduled: None****Notice to Clerk is Being Given of Related Case under Local Civil Rule 1.6:**

Notice is being given via US Mail to the Clerk under Local Rule 1.6 of the existence of a another case, believed to be related, pending before District Judge Hellerstein of this Court, *Kathleen Prokesch d/b/a Metropolitan Events v. Denise Restauri and Gurl2Gurl Productions, Inc.* 10 CV 722. It is mentioned in this letter because of its possible impact on conferences and scheduling.

I have today also faxed a substantially similar letter addressed to District Judge Hellerstein.

Very truly yours,

Vincent J. Restauri, Jr.

PRO SE: Denise J. Restauri, individually and as President of Gurl2Gurl Productions, Inc.  
101 West 55th Street, Apartment 15K, New York, NY 10019 (212) 757-7841

cc: Jeremiah F. Manning, Esquire (fax and email)

Request GRANTED. A status conference herein is scheduled for <u>2-26-10</u> at <u>4:45 P.M.</u> to address the matter described above by <u>defendants</u> . The time for defendants to answer or otherwise respond to the <u>SO ORDERED</u> complaint is extended to <u>3-1-10</u>	
<u>2-22-10</u> DATE	 VICTOR MARRERO, U.S.D.J.